

1 Michael S. Danko (SBN 111359)
2 Kristine K. Meredith (SBN 158243)
DANKO MEREDITH
3 333 Twin Dolphin Drive, Suite 145
Redwood Shores, California 94065
4 Telephone: (650) 453-3600
Facsimile: (650) 394-8672
5 mdanko@dankolaw.com
kmeredith@dankolaw.com

6
7 Eric Gibbs (SBN 178658)
Dylan Hughes (SBN 209113)
GIBBS LAW GROUP LLP
8 505 14th Street, Suite 1110
Oakland, California 94612
9 Telephone: (510) 350-9700
Facsimile: (510) 350-9701
10 ehg@classlawgroup.com
dsh@classlawgroup.com

11 Dario de Ghetaldi (SBN 126782)
Amanda L. Riddle (SBN 215221)
COREY, LUZAICH
DE GHETALDI & RIDDLE LLP
12 700 El Camino Real
P.O Box 669
Millbrae, California 94030
Telephone: (650) 871-5666
Facsimile: (650) 871-4144
deg@coreylaw.com
alr@coreylaw.com

13 Attorneys for
Michael Lamberts and Martha Lamberts

14
15 UNITED STATES BANKRUPTCY COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 **In re:**

19 **PG&E CORPORATION,**

20 **&**

21 **PACIFIC GAS AND ELECTRIC
COMPANY,**

22 Case No. 19-30088
23 Chapter 11
(Lead Case)

24 **DECLARATION OF NO RESPONSE TO
MOTION FOR ORDER AUTHORIZING
WITHDRAWAL OF COUNSEL**

25
26 **Debtors.**

27 I, Michael S. Danko, declare as follows:

28 1. I am an attorney duly admitted to practice before all courts of the State of
California, including the Northern District.
2. I am an attorney with Danko Meredith ("firm"), attorney of record for Bankruptcy

1 3. I am informed and believe that facts set forth in this Declaration are true of my
2 personal knowledge, and if called upon to do so I could and would competently testify to these
3 facts.

4 4. On November 2, 2020, the firm filed a Notice of Motion and Motion for Order
5 Authorizing Withdrawal of Counsel (Docket No. 9387).

6 5. On November 2, 2020, the firm served a copy of Notice of Motion and Motion
7 for Order Authorizing Withdrawal of Counsel on required parties using the methods of service
8 identified on the Certificate of Service.

9 6. On November 2, 2020, the firm filed the Certificate of Service (Docket No.
10 9388).

11 7. Pursuant to Bankruptcy Local Rule 9014-1(3)(A), the notice of motion provides
12 that the deadline to file and served a written response for hearing is 21 days after the date of
13 service of the motion.

14 8. More than 21 days have passed after service of the notice of motion.

15 9. The firm checked the docket for this bankruptcy case and/or adversary
16 proceedings and no response or request for hearing was timely filed.

17 10. No response or request for hearing was timely served on the firm via Notice of
18 Electronic filing or at the street address, mail address, or facsimile number specified on the
19 notice of motion.

20 11. Based on the foregoing and pursuant to Bankruptcy Local Rule 9014-1(3)(A), a
21 hearing has not been requested and is not required.

22 12. We request that the court grant the motion and enter an order without a hearing.

23
24 I declare under penalty of perjury in accordance with the laws of the State of California
25 that the foregoing is true and correct. Executed on November 24, 2020 at Redwood Shores,
26 California.

27
28 
Michael S. Danko